

UNITED STATES DISTRICT COURT  
for the  
Western District of Washington

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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)  
US Mail Parcel, bearing confirmation number  
EI777246154US

Case No. WJ14-18

**APPLICATION FOR A SEARCH WARRANT**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

US Mail Parcel, bearing confirmation number EI777246154US as more fully described in Attachment A.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, U.S.C. § 841	Distribution of Controlled Substances & Unlawful Use of a Communications
Title 21, U.S.C. § 843	Facility, (U.S. Mails) to Distribute Controlled Substances.

The application is based on these facts:

See affidavit of Samantha L. Knoll, U.S. Postal Inspector

- Continued on the attached sheet.
- Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Samantha Knoll

Applicant's signature

Samantha L. Knoll, U.S. Postal Inspector

Printed name and title

Judge's signature

Judge's signature

Dean Brett

U.S. Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/16/2014 2pm

City and state: Seattle, Washington

**STATE OF WASHINGTON )  
COUNTY OF KING )  
ss )**

## AFFIDAVIT

Samantha L. Knoll, being first duly sworn on oath, deposes and says:

## BACKGROUND

1. **Affiant Background.** I am a U.S. Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since May 2012. I am currently assigned to the Seattle Division, Prohibited Mails Narcotic Team, where I investigate controlled substances transported via the United States Mail. I completed a twelve week Basic Inspector Training course in Potomac, Maryland, which included training regarding transportation of narcotics via the U.S. mails. I have also received training on the identification of controlled substances and interdiction of controlled substances.

**2. Duties, Training & Experience.** As part of my duties, I investigate the use of the U.S. mails to illegally mail and receive controlled substances, the proceeds of drug trafficking, as well as other instrumentalities associated with drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute controlled substances), and 843(b) (unlawful use of a communication facility, including the U.S. mails, to facilitate the distribution of controlled substances). As set forth below, my training and experience includes identifying parcels with characteristics indicative of criminal activity. During the course of my employment with the USPIS, I have participated in over one-hundred (100) criminal investigations involving suspicious parcels and controlled substances.

3. The information contained in this affidavit is based upon knowledge I gained from my investigation, my personal observations, my training and experience, and investigation by other Inspectors, agents, and officers. Because the purpose of this

1 affidavit is limited to setting forth probable cause to search the subject parcel, I have not  
2 set forth every fact of which I am aware pertaining to the investigation.

3       4. From my training and experience, I am aware that the United States Postal  
4 Service (USPS) mail system is often used to transport controlled substances and/or the  
5 proceeds from the sales of controlled substances throughout the United States. I have  
6 learned and observed that sometimes drug traffickers put controlled substances and  
7 proceeds in the same package. I also know that drug traffickers prefer mail/delivery  
8 service such as Express Mail because of the reliability of this service as well as the ability  
9 to track the article's progress to the intended delivery point. When a drug trafficker  
10 learns that a mailed article has not arrived as scheduled, he/she becomes suspicious of  
11 any delayed attempt to deliver the item.

12       5. In addition, I am aware that the USPS Express Mail service was custom-  
13 designed to fit the needs of businesses by providing overnight delivery for time sensitive  
14 materials. Business mailings often contain typewritten labels, are in flat cardboard  
15 mailers, and usually weigh less than eight (8) ounces. In addition, businesses using  
16 corporate charge accounts and/or print their account number on the Express Mail label in  
17 order to expedite transactions with USPS.

18       6. Based on my training and experience concerning the use of Express Mail  
19 for the transportation of controlled substances and/or the proceeds from the sales of  
20 controlled substances, I am aware these packages usually contain some or all of the  
21 following characteristics (which are different than characteristics of packages being sent  
22 by legitimate businesses):

23           a. Unlike typical Express Mail business mailings which usually have  
24 typed labels, packages containing controlled substances and/or proceeds often have  
25 handwritten address information. In addition, the address information often contains  
26 misspelled words or incomplete/incorrect addresses. This is done in an effort to help  
conceal the identities of the individuals involved.

27           b. The handwritten label on Express Mail packages containing  
28 controlled substances and/or proceeds does not contain a business account number and/or  
credit card number. This is an indication that the sender likely paid cash. A credit card

1 or business account number would more likely enable law enforcement officers to  
2 connect the package to identifiable individuals.

3 c. Express Mail packages containing controlled substances and/or  
4 proceeds often stand out from typical business mailings as they do not bear any  
5 advertising on the mailing container/box, and are usually being mailed from one  
individual to another.

6 d. The sender and/or recipient addresses on Express Mail packages  
7 containing controlled substances and/or proceeds often either are fictitious, are persons  
not known to postal personnel familiar with the addresses listed.

8 e. The zip codes for the sender addresses on Express Mail packages  
9 containing controlled substances and/or proceeds is different from the zip codes of the  
10 post offices from where the parcels were mailed.

11 f. Express Mail packages containing controlled substances and/or  
12 proceeds are heavily taped with tape on the seams of the parcel, in an effort to conceal  
13 scent.

14 g. Express Mail packages containing controlled substances and/or  
15 proceeds include a waiver of signature. As a general matter, Express Mail requires a  
signature confirming receipt. Therefore, if a sender does not want a confirmation  
16 signature, he/she must affirmatively waive this requirement but checking a box.

17 7. Inspectors who encounter a package with any or all of the above  
18 characteristics often further scrutinize the package by, among other tactics, conducting  
19 address verifications using law enforcement databases and conducting trained narcotic-  
20 detecting canine examinations.

#### 21 ITEM TO BE SEARCHED

22 As set forth in Attachment A, this affidavit is made in support of an application for  
23 a search warrant for one USPS Express Mail parcel, hereinafter referred to as "SUBJECT  
24 PARCEL." This parcel is believed to contain controlled substances or proceeds from the  
25 sale of controlled substances. The SUBJECT PARCEL is further described as follows:  
26 One Express Class parcel addressed to "Patrick Thomas 2711 Parkway Dr West  
27 University Place, WA 98466" with a return address of "Lisa Thomas 1788 Newport Ave  
28

1 Pasadena, CA 91103." This parcel measures approximately 12.5" x 9.5" with a weight of  
2 approximately 8 oz. This parcel is postmarked January 13, 2014, from zip code 91001 in  
3 Altadena, California and carries \$19.95 in postage. The delivery confirmation number is  
4 EI777246154US.

5 **ITEMS TO BE SEIZED**

6 8. The application requests that law enforcement officers and agents be  
7 authorized to seize the following from the SUBJECT PARCEL, which constitute the  
8 fruits, instrumentalities, and evidence of mailing and distribution of controlled substances  
9 in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and  
10 possession with intent to distribute controlled substances) and 843(b) (unlawful use of a  
11 communication facility, including the U.S. mails, to facilitate the distribution of  
12 controlled substances):

13 a. Controlled substances, including, but not limited to, cocaine, crack  
14 cocaine, heroin, hashish, marijuana, methamphetamine, MDMA, methadone, oxycodone,  
and Oxycontin;

15 b. Monetary instruments, including but not limited to, currency, money  
16 orders, bank checks, or gift cards;

17 c. Controlled substance-related paraphernalia;

18 d. Documentary evidence relating to the purchase, sale, and/or  
19 distribution of controlled substances;

20 e. Notes, letters and other items which communicate information  
21 identifying the sender and/or recipient or pertaining to the contents of the mailing; and

22 f. Fingerprints and/or handwriting, to identify who handled and/or  
23 mailed the package.

24 **THE INVESTIGATION**

25 9. On January 14, 2014, Customs and Border Patrol K9 Officer Kristina M.  
26 Johnson and I were performing an Express Mail interdiction at the United States Postal  
27 Service mail facility located at Seattle Processing and Distribution Center (P&DC),  
28

1 10700 27th Ave. S., Seattle, Washington. The emphasis for the interdiction was targeting  
2 inbound Express Mail parcels and envelopes for narcotics and monetary proceeds derived  
3 from illegal drug trafficking activity.

4 10. SUBJECT PARCEL was initially identified as a suspicious package due to  
5 its hand written label, signature waiver and difference in return address and mailing zip  
6 codes. As previously described, these are tactics commonly used by drug traffickers using  
7 the U.S. mails in an attempt to elude law enforcement.

8 11. Using U.S. Postal Service and law enforcement databases, I researched the  
9 sender name and address listed on SUBJECT PARCEL. The address "1788 Newport  
10 Ave, Pasadena, CA 91103" is a true and deliverable address, however, no individual by  
11 the name of "Lisa Thomas" is associated with "1788 Newport Ave, Pasadena, CA  
12 91103."

13 12. Using U.S. Postal Service and law enforcement databases, I also researched  
14 the recipient address. The address "2711 Parkway Dr West, University Place, WA  
15 98466" is a true and deliverable address, however, no individual by the name of "Patrick  
16 Thomas" is associated with the recipient address.

17 13. Based upon this information, on January 14, 2014 at approximately  
18 9:40 am, inspectors placed the SUBJECT PARCEL in an open area with four other  
19 "control parcels." SUBJECT PARCEL was placed in the second position. Customs and  
20 Border Protection K9 Officer Kristina Johnson applied "Layla," a narcotic-detection dog  
21 to the four control parcels as well as SUBJECT PARCEL. Officer Johnson observed an  
22 immediate change of behavior when Layla approached SUBJECT PARCEL. Layla  
23 performed "sit" indicating the positive odor of narcotics emitting from the parcel. CBP  
24 Officer Johnson's affidavit describing Layla's training and qualifications is attached to  
25 this Affidavit and incorporated herein by reference.

26 14. I subsequently attempted to contact the listed recipient of SUBJECT  
27 PARCEL at 2711 Parkway Drive West, University Place, Washington 98466. There I  
28 spoke with two residents who stated that no individual by the name of "Patrick Thomas"

1 resides at the address and that neither knows a "Patrick Thomas." The two residents  
2 stated further that they were not expecting parcels of any kind from California.

3 **CONCLUSION**

4 15. Based on the facts set forth in this Affidavit, as well as the attached  
5 affidavit (incorporated herein by reference) of Officer Kristina M. Johnson, I believe  
6 there is probable cause to conclude that the SUBJECT PARCEL contains controlled  
7 substances, currency, documents, or other evidence, more fully identified in Attachment  
8 B, that relates to the mailing and distribution of controlled substances, in violation of  
9 Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent  
10 to distribute controlled substances) and 843(b) (unlawful use of a communication facility,  
11 including the U.S. mails, to facilitate the distribution of controlled substances).

12   
13 Samantha L. Knoll  
14 SAMANTHA L. KNOLL  
15 U.S. Postal Inspector, US Postal Inspection Service

16  
17 SUBSCRIBED AND SWORN to before me this 16 day of January, 2014.  
18

19   
20 DEAN BRETT  
21 U.S. MAGISTRATE JUDGE  
22  
23  
24  
25  
26  
27  
28

**ATTACHMENT A**  
Parcel to be searched

One Express Class parcel addressed to "Patrick Thomas 2711 Parkway Dr West University Place, WA 98466" with a return address of "Lisa Thomas 1788 Newport Ave Pasadena, CA 91103." This parcel measures approximately 12.5" x 9.5" with a weight of approximately 8 oz. This parcel is postmarked January 13, 2014, from zip code 91001 in Altadena, California and carries \$19.95 in postage. The delivery confirmation number is EJ777246154US.

**ATTACHMENT A**  
**PARCEL TO BE SEARCHED**

**ATTACHMENT B**

The following items that constitute evidence, instrumentalities, or fruits of violations of Title 21, United States Code, Section(s) 841(a)(1) and 843(b), unlawful use of a communication facility, including the U.S. mails, to facilitate the distribution of controlled substances:

a. Controlled substances, including, but not limited to, cocaine, crack cocaine, heroin, hashish, marijuana, methamphetamine, MDMA, methadone, oxycodone, and Oxycontin;

b. Monetary instruments, including but not limited to, currency, money orders, bank checks, or gift cards;

c. Controlled substance-related paraphernalia;

d. Documentary evidence relating to the purchase, sale, and/or distribution of controlled substances;

e. Notes, letters and other items which communicate information identifying the sender and/or recipient or pertaining to the contents of the mailing; and

f. Fingerprints and/or handwriting, to identify who handled and/or mailed the package.



**U.S. Customs and Border Protection  
Department of Homeland Security**

**Canine Enforcement Office**  
19339 28<sup>th</sup> Ave. S. Bldg. D  
Sea-Tac, WA 98188

## **AFFIDAVIT**

I, Kristina M. Johnson, am a Canine Officer with U.S. Customs and Border Protection, assigned to the Seattle-Tacoma area. My assigned canine "Layla" CH-93 was initially certified with me at the Customs and Border Protection's Canine Center of Front Royal on April 2, 2009 after successfully completing the U.S. Customs and Border Protection detection canine training academy. Canine "Layla" was trained to detect the odors of cocaine, marijuana, heroin, methamphetamine, hashish, ecstasy, and their derivatives. I and canine "Layla" maintain our annual certification through the Customs and Border Protection regulations. This certification is a comprehensive test designed to measure the ability of the dog and the handler in searching for and indicating the presence of controlled substances. This certification consists of searches administered in different environments with a variety of distractions and is designed to duplicate actual field conditions which may be encountered by the canine team. Canine "Layla" must pass 12 of the 12 controlled finds which equates to a 100% accuracy.

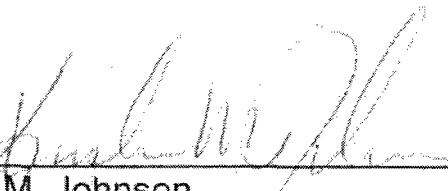
I and canine "Layla" participate in maintenance training which is no less than 16 hours per month. On-going training includes:

- Training in all areas of interdiction, such as vehicles, boats, schools, currency, parcels and mail, airports, bus and bus depots, storage units, residences, motels, apartments, etc;
- Training on various quantities of controlled substances, ranging from grams to pounds;
- Training on controlled negative (blank) testing, in which all objects or locations have no contraband present;
- Conflict training, which proofs the dog and prevents her from alerting to common items associated with controlled substances, such as plastic bags, etc., and/or reward objects or toys.

CBP maintains training records of the on-going training. All training records and certifications are constantly maintained and up to date and current. The dogs are given a rating at each training day that is maintained for 90 days. The ratings for each training day are based on unsatisfactory, poor, fair, average, good, or excellent performance. Canine "Layla" has maintained a rating of "Good" over the last 90 days. Canine "Layla" is trained with a passive response/indication (sit or lay down), with a rolled up towel being her reward.

On January 14, 2014 at 0940hrs at the Processing and Distribution office 10700 27<sup>th</sup> Ave S, Seattle, WA 98168. I along with canine "Layla" searched five packages that were placed in a line, four controlled packages and one suspect package. Canine "Layla" alerted to USPS parcel tracking number EI777246154US which was in position #2. The package was mailed from Altedena, CA 91001 on January 13, 2014. The USPS parcel is being shipped from "Lisa Thomas" 1788 Newport Ave, Pasadena, CA 91103 to "Patrick Thomas" 2711 Parkway Dr. West, University Place, WA 98466.

I have been a Canine Officer since October 2008.

Signed   
Kristina M. Johnson

Customs and Border Protection Officer (K-9)  
U.S. Customs and Border Protection  
Seattle, WA  
(206) 396-1864 (cell)  
Kristina.johnson@cbp.dhs.gov

Date 14 Jan 2014